

DEPARTMENT OF JUSTICE
NEW CASTLE COUNTY
820 NORTH FRENCH STREET
WILMINGTON, DELAWARE 19801

CIVIL DIVISION (302) 577-8400 FAX (302) 577-6630 CRIMINAL DIVISION (302) 577-8500 FAX (302) 577-2496 FRAUD DIVISION (302) 577-8600 FAX (302) 577-6499 TTY (302) 577-5783

April 25, 2008

JOSEPH R. BIDEN, III

ATTORNEY GENERAL

Mr. Richard E. Shockley, Jr., Inmate SBI#166400 Morris Community Correctional Center 300 Water Street Dover, DE 19901

Re: Shockley v. Taylor et al., C.A. No. 06-126-JJF

Dear Mr. Shockley,

This letter is in response to your letter of April 22, 2008 wherein you write that you no longer have your response to *Defendants' Request for Production of Documents* [D.I.#47] and *First Set of Interrogatories*. [D.I.#48] You further write that that your discovery responses were probably lost when you changed prison facilities. As you requested, I am enclosing your responses, to which I received from you on or about October 10, 2007. Additionally, I will attach as an exhibit with this letter a copy of your responses with the Court since these documents are not reflected on the court's docket.

Sincerely yours,

/s/Catherine Damavandi Catherine Damavandi, Deputy Attorney General

Clerk of the Court

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Richard E. Shockley, JR., Plaintiff.

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Stanley Taylor, Thomas Carroll, LT. McCarty, LT. Satterfield, SGT. Marvin Creasy, SGT. Vangorder, Officer Roger Roney, and Officer Calhoun,

Defendants,

C.A.No. 06-126-JJF Trial By Jury Demanded

Plantiff's Response To Defendant's Interrogatories.

i) All facts were supplied in the Original Complaint, and Exhibits.

2) All Documents were provided in original complaint and Exhibits.

3) All persons are listed in original complaint and Exhibits.

4) All persons listed in complaint and Exhibits.

5) Personal testimony from Defendants and Interogatories.

6) None at this time-

7) 2. Richard E. Shockeleyi JR. B: ZZZ-5Z-7130

C, 1-14-62

O. Dover, DE.

E.G.E.D.

9) This has no bearing on the complaint.

a) This has no bearing on the Complaint.

10. N/A

11. Shuckley V. Turbert, Superior Court Georgetown, DE. 19942 (2001) Auto Lecident.

12. Not associated with this case.

13. Not associated with this case.

14. See Complaint and Exhibits.

15. See Complaint and Exhibits.

16. A. None. B. None.

17. See Original Complaint and Exhibits.

18. See Original complaint and Exhibits.

19. NO.

20. See Original Complaint and Exhibits. 21. See Original Complaint

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF DELAWARE

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)	C.A. No. 06-126-JJF
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)	Trial by Jury Demanded
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## **VERIFICATION AS TO ANSWERS:**

I hereby declare under penalty of perjury that the attached Plaintiff's Responses to Defendants' Interrogatories are true and correct.

Richard E. Shockley, Jr

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Richard E. Shockley, JR., plaintiff.

C.A. No. 06-126-JJF Trial by Jury Demanded

Stanley Taylor, Thomas Carroll, Et. McCarty, LT. Satterfield, SGT. Marvin Creasy, SGT. Vangorder, Officer Roger Raney, and Officer Calhoun,

Defendants.

Plaintiff's Answer To Defendant's Request For Production OF Document's And Things Directed To Plaintiff

Request No.1., Included in Original complaint, and exhibits. Request No. 2, Included in original complaint and exhibits. Request No. 3, Included in original complaint and Exhibits. Request No. 4., Prior criminal history does not pertain to this.

Request No. 5, None

Request No. 6, Prior Medical History does not pertain to this.

Request No 7, Included in original Complaint and Exhibits.

Under the penalty of persony I swear the foregoing is true and correct to the best of my knowledge.

Respect fully, Richard Shally J.

## Certificate of Service

I, Richard E. Shoeldey, JR 1	nereby certify that I have served a true	
and correct cop(ies) of the attached: Answer 7	To production of documents,	
and Answer To Defendant's Int	•	
parties/person (s):	•	
TO: Sileen Kelly	TO: U.S. District Court	
Deputy Attorney General 820 N. French St 6th Floor	844 Niking St.	
820 Ni French St 6th Floor	LOCK BOX 18	
Wilmington, DE.	Wilmington, DE.	
19801	19801	
TO:	TO:	
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BY PLACING SAME IN A SEALED ENVELO. States Mail at the		
Sussex Correctional Instit	rute, Georgetown, DE. 19947	
On this 25th day of September	200 7	
Juhand E. Shockly . f.		
Proposal 2	Shortly of	